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**REVISIONS TO FERNALD ENVIRONMENTAL
MANAGEMENT PROJECT (FEMP) HAZARDOUS
WASTE MANAGEMENT UNIT (HWMU)
DETERMINATION FOR THE PARTS CLEANER
UNIT IN THE WELDING**

02/28/92

**DOE-997-92
DOE-FO/OEPA
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LETTER**



Department of Energy
Fernald Environmental Management Project
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FEB 28 1992

DOE-997-92

Donald R. Schregardus, Director
Ohio Environmental Protection Agency
P. O. Box 1049
1800 WaterMark Drive
Columbus, Ohio 43266-0149

Dear Mr. Schregardus:

**REVISIONS TO FERNALD ENVIRONMENTAL MANAGEMENT PROJECT (FEMP) HAZARDOUS WASTE
MANAGEMENT UNIT (HWMU) DETERMINATION FOR THE PARTS CLEANER UNIT IN THE WELDING
SHOP IN BUILDING 12A**

This letter was prepared, in lieu of submitting Closure Plan information and data, to meet a requirement of the schedule of activities submitted to the Ohio Environmental Protection Agency (OEPA) on August 27, 1991. The referenced schedule was submitted to comply with a requirement in Section II, Paragraph 3.12 of the proposed Amended Consent Decree (PACD) between the State of Ohio and Department of Energy (DOE), et. al. (CIVIL NO. C-1-86-0217). In paragraph 3.12 of the PACD, DOE is required to submit a schedule of projected activities at the FEMP to bring newly identified HWMUs into compliance with applicable OEPA hazardous waste rules.

The August 27, 1991, schedule includes timetables for submitting Closure Plan information. Under the schedule, the submittal of Closure Plan information and data for the Parts Cleaner unit in the Welding Shop is due on February 27, 1992. Since August 1991, it has been determined that the Parts Cleaner unit was inappropriately identified as a HWMU and is not subject to Ohio hazardous and solid waste rules. As a result, although the document has been completed, it has been concluded that Closure Plan information and data is not required because the Parts Cleaner unit is not a HWMU.

On September 5, 1991, Westinghouse Environmental Management Company of Ohio (WEMCO) Compliance and representatives of Department of Energy, Fernald Office (DOE-FO), informed the OEPA that the FEMP has reviewed several of the HWMU determinations for units included in the June 1991, submittal of the Part A Permit Application, Revision 11. This letter addresses the HWMU determination for the Parts Cleaner unit (identified on the Part A as Unit 2).

After submitting the Part A Permit Application in June 1991, and the schedule of compliance activities on August 27, 1991, additional investigations and reviews were concluded. Based on these investigations and reviews, the FEMP has concluded that the basic assumption made in the original HWMU determination for the Parts Cleaner unit was erroneous.

The original HWMU determination for the Parts Cleaner unit was based on an assumption that waste solvents were stored in the unit in excess of ninety days after it was placed out of service. In June 1991, an ongoing evaluation of suspected radiation hazards prevented inspection of the interior of the unit. Based on the limited information available at that time, it was assumed that solvent wastes were being stored in the unit. In July 1991, the radiation evaluations had been completed and the interior of the unit was inspected. The inspection revealed that there were no solvent residues in the Parts Cleaner unit. Along with the inspection, additional interviews with Maintenance personnel were conducted. Based on these interviews, it was determined that all solvent residues were drained and removed in May 1989, when the Parts Cleaner unit was placed out of service. Pursuant to 3745-51-04(C), it has been determined that no hazardous or non-hazardous solid wastes have been managed in the Parts Cleaner unit.

A fact sheet concerning the Parts Cleaner unit HWMU determination was delivered to OEPA on September 5, 1991. Consistent with the fact sheet, the FEMP has determined that the Parts Cleaner unit in the Welding Shop should be removed from the list of regulated units.

A revised Part A Permit Application (Revision 13) is being prepared for submittal to the OEPA by March 31, 1992. The revised Part A Permit Application will incorporate changes based on the HWMU determination for the Parts Cleaner unit.

This letter is submitted to U.S. EPA for information only. No action or response by the U.S. EPA is required. This document is provided to keep you informed of activities undertaken at the FEMP to comply with OEPA requirements.

If you or your staff have any questions, please contact David Rast at FTS 774-6322 or (513) 738-6322.

Sincerely,



Gerald W. Westerbeck
Deputy Manager

FN:Rast

cc:

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